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EX PARTE OR LATE FILED

June 19, 1998

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

EX PARTE

Magalie R. Salas, Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, DC 20554

RE: Communications Assistance for Law Enforcement Act (CC Docket No. 97-213)

Dear Ms. Salas:

On Thursday, June 18, 1998, I met with David Wye and Tejal Mehta from the Wireless Telecommunications Bureau and Rodney Small and Charles Iseman from the Office of Engineering and Technology to discuss issues relating to the petitions for extension of the CALEA compliance deadline. Details are provided in the attached letter which was provided to David Wye at the meeting. Please associate the attached material with the above-referenced proceeding.

Two copies of this notice are being submitted to the Secretary in accordance with Section 1.1206(a)(1) of the Commission's Rules.

Please stamp and return the provided copy to confirm your receipt. Please contact me at 202-293-4960 should you have any questions or require additional information concerning this matter.

Sincerely,

A handwritten signature in black ink that reads "Pamela J. Riley".

Pamela J. Riley

cc: David Wye
Tejal Mehta
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Charles Iseman

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June 18, 1998

Magalie R. Salas, Secretary
Federal Communications Commission
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Re: *Communications Assistance for Law Enforcement Act, CC Docket
No. 97-213: Ex Parte Presentation*

Dear Ms. Salas:

AirTouch Communications, Inc. ("AirTouch") submits this letter pursuant to Section 1.1206(a)(2) of the Commission's rules to address several points raised in the reply comments submitted recently by the Department of Justice and Federal Bureau of Investigation (collectively, "DOJ/FBI") regarding the pending petitions for an extension of the October 25, 1998 date for compliance with the assistance capability requirements imposed by the Communications Assistance for Law Enforcement Act ("CALEA").¹ Pursuant to Section 1.1206(a), an original and one copy of this letter are being filed with your office. Please associate this letter with the file in the above-captioned proceeding.

¹ "Communications Assistance for Law Enforcement Act," CC Docket No. 97-213, *Public Notice*, DA 98-372 (April 20, 1998); DOJ/FBI, Reply Comments Regarding the Commission's Authority to Extend the October 25, 1998 Compliance Date, CC Docket No. 97-213 (May 15, 1998) ("DOJ/FBI Reply"). AirTouch submitted comments and reply comments in this proceeding. Further, AirTouch and AirTouch Paging have each filed individual petitions seeking extension of the CALEA compliance deadline.

This letter responds to the DOJ/FBI arguments regarding the narrow issues of (a) how to extend the deadline, and (b) for how long. The fundamental issue of whether an extension is warranted is undisputed.² Nevertheless, DOJ/FBI assert that the Commission is prohibited from granting a blanket extension of time applicable to all telecommunications carriers and that any extension should terminate on the earlier of (a) December 1999, or (b) the date a compliance solution that “*substantially*” facilitates compliance on an industry-wide basis becomes available.³

As discussed below, the DOJ/FBI is wrong on both points. The Commission has ample authority under Sections 4(i) and (j) of the Communications Act as well as CALEA Section 107(c) to grant the requested blanket extension. Further, by tying the termination of an extension to the date that the first substantially CALEA-compliant solution becomes available, the FBI/DOJ is limiting, contrary to the express intent of Congress, a carrier’s ability to choose and control the types of CALEA solutions it adopts to ensure the solution chosen best suits its network requirements. Moreover, DOJ/FBI appears to seek Commission grant of a *de facto* monopoly over CALEA solutions to the first vendor which develops a product that, in DOJ/FBI’s opinion, “substantially” complies with CALEA.

² At this late date, and with the record before the Commission, it is beyond question that equipment vendors cannot provide CALEA solutions by the October 1998 compliance deadline. Indeed, the Attorney General testified before Congress in February that vendors will require at least 18 months after the Commission’s order to build solutions which comply with the order. *See* Testimony of the Attorney General before the House Appropriations Subcommittee for Commerce, State, Justice, the Judiciary, and Related Agencies (Feb. 26, 1998). *See also* Letter from David Yarbrough, FBI, to Magalie Salas, FCC Secretary, CC Docket No. 97-213, at 2 (April 14, 1998)(“April 14 DOJ/FBI Ex Parte”). Consequently, because the technology will not be available within the compliance deadline, telecommunications carriers need and are entitled to an extension of the CALEA compliance deadline. Law enforcement will also need an extension because until the controversy over the industry standard is resolved, law enforcement will be unable to obtain the collection equipment needed to receive intercepts in the CALEA format.

³ DOJ/FBI Reply at 12 ¶ 19 and 13 ¶ 21 (emphasis added).

I. One Extension Order vs. Thousands of Redundant Extension Orders.

The Commission has historically entered industry-wide, or “blanket” relief when all members of the industry find themselves in the same position, the Commission noting that such relief “prevent[s] the repeated expenditure of carrier and staff resources to revisit . . . issues already examined.”⁴ In fact, as recently as April, DOJ/FBI supported a blanket extension as well — at least for certain carriers.⁵

Reversing course, DOJ/FBI now claim that, while the Commission may grant thousands of carrier-specific extensions of the CALEA compliance date,⁶ it may not lawfully grant one, industry-wide extension of the same date.⁷ Relying on the reference to the singular “carrier” in Section 107(c)(1), DOJ/FBI argue that granting a blanket extension order covering all carriers would be “fundamentally contrary to the clear intent of Congress.”⁸ In short, the DOJ/FBI would have the Commission believe that Congress expects it to engage in the senseless procedure of reviewing and approving thousands of carrier-specific petitions — petitions that would be entirely redundant because carriers use the same vendor equipment in their networks.

⁴ See *Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-128, *Memorandum Opinion and Order*, DA 98-481, at ¶ 47 (March 9, 1998); *Ameritech Operating Companies*, 6 FCC Rcd 1541, 1542 ¶ 18 (1991); *Implementation of Sections 11 and 13 of the Cable Television Consumer Protection and Competition Act*, 8 FCC Rcd 6828, 6841 ¶ 90 (1993).

⁵ In its April 14, 1998 Ex Parte, DOJ/FBI took the position that for LECs, cellular carriers, and broadband PCS licensees, “the compliance date should be extended for a period of 18 months after the Commission Order is issued.” *Id.* at 2. However, with respect to “other telecommunications technologies” for which *no* capacity or capability requirements have been specified, they inexplicably “suggested . . . that a blanket extension for compliance with CALEA was inappropriate at this time.” *Id.*

⁶ DOJ/FBI Reply at 4 ¶ 6 (CALEA “gives the Commission authority only to grant individualized extensions of petitions from individual carriers.”)(emphasis in original).

⁷ *Id.* at 1 ¶ 1 (There is “no valid source of authority for the Commission to declare an industry-wide extension of the Act’s compliance date.”).

⁸ DOJ/FBI, Comments Regarding the Commission’s Authority to Extend the October 25, 1998 Compliance Date, CC Docket No. 97-213 (May 8, 1998)(“DOJ/FBI Comments”).

The DOJ/FBI argument is remarkable given their position in this very proceeding that “duplication of effort and expense is inconsistent with the spirit and purposes of CALEA.”⁹ The DOJ/FBI argument is also remarkable given their claim that, while the Commission may not grant a “blanket” extension, they — *without any statutory authority* — can grant industry a “blanket” extension.¹⁰ More fundamentally, DOJ/FBI are wrong under the statute.

A. Section 107(c) may be construed to permit a blanket extension

The DOJ/FBI argument imparts inappropriate significance to the use of the singular term “carrier” rather than the plural “carriers” in Section 107(c)(1).¹¹ DOJ/FBI argue that Congress, by drafting Section 107(c)(1) in the singular, necessarily excluded the plural thereby denying the Commission authority to issue an industry-wide extension. However, this argument violates a basic principle of statutory construction. Indeed, the very first provision of the United States Code states:

In determining the meaning of any Act of Congress, unless the context indicates otherwise . . . words importing the singular include and apply to several persons, parties, or things [and] words importing the plural include the singular.¹²

⁹ DOJ/FBI Reply Comments, CC Docket No. 97-213, at 5-6 ¶ 7 (Feb. 11, 1998).

¹⁰ DOJ/FBI state they are willing to execute “federal enforcement forbearance agreements” on “a platform-by-platform (or solution-by-solution) basis.” DOJ/FBI Comments at 19 ¶ 33. This proposal is neither “practical” nor “legal” as DOJ/FBI assert. *Id.* at 17 ¶ 31. It is not practical because, as even the FBI concedes, unlike an FCC extension order a “federal” agreement does not protect carriers from enforcement actions filed by state law enforcement agencies. *Id.* at 17 n.3. Further, the extra-statutory procedure contemplated by DOJ/FBI is not subject to the “public accountability” that is the hallmark of CALEA and it ignores procedures explicitly established by Congress for *Commission* resolution of this matter. See H.R. Rep. No. 103-827, at 14, 20, and 27-28 (1994), *reprinted in* 1994 U.S.C.C.A.N. 3489, 3494, 3500, and 3507-08 (“House Report”).

¹¹ See 47 U.S.C. § 1006(c).

¹² 1 U.S.C. § 1; see also 2A Sutherland Statutory Construction § 47.34 (5th Ed 1992). The statutory construction act in 1 U.S.C. § 1 has been construed and approved by the United States Supreme Court. See *Barr v. United States*, 324 U.S. 83 (1944) (construing a statute which addressed itself to a singular rather than a plural “buying rate”); see also *Sweet v. Babbitt*, 1 F.3d 1, 18 (D.C. Cir. 1993); *Central & Southern Motor Freight Tariff Ass’n v. United States*, 843 F.2d 886, 894 (6th Cir. 1988).

This rule of construction is to be applied when “necessary to carry out the evident intent of the statute.”¹³ The record of this proceeding demonstrates clearly that the “evident intent” of Section 107(c) and other provisions, was to enable the Commission to govern the CALEA implementation process in a cost-effective manner and to protect carriers from implementation obligations where compliance is impossible to due a lack of available compliant technology. It stands to reason that Congress did not adopt such a policy and then limit its potential application only on a case-by-case basis, where such an approach is needlessly cumbersome and expensive. Indeed, nothing in the statute or the legislative history supports any such limitation.¹⁴ Thus, under 1 U.S.C. § 1, the Commission is free to construe the reference to “carrier” in Section 107(c)(1) in the plural as well as the singular.

B. A blanket extension is permissible under the Commission’s broad discretion under Sections 4(i) and (j) of the Communications Act

Application of this cannon of statutory construction to permit grant of a blanket extension is particularly apt in this case. Sections 4(i) and (j) of the Communications Act give the Commission broad discretion to undertake such actions as “may be necessary in the execution of its functions” and to “conduct its proceedings in such manner as will best conduce to the proper dispatch of business and to the ends of justice.”¹⁵ As the Supreme Court has noted in interpreting Section 4(j), in adopting this provision:

Congress was mindful not only of the ends of justice but also of the proper dispatch of the Commission’s business, a matter not unrelated to achieving the ends of justice, and left largely to its judgment the determination of the manner of conducting its business which would most fairly and reasonably accommodate those ends.¹⁶

¹³ *First National Bank In St. Louis v. Missouri*, 263 U.S. 640, 657 (1924).

¹⁴ *See* House Report at 28.

¹⁵ 47 U.S.C. §§ 154(i), (j).

¹⁶ *FCC v. WJR, The Goodwill Station, Inc.*, 337 U.S. 265, 282 (1949).

If the Commission finds that Section 107(c)(1) does not authorize grant of a blanket extension, it will be faced with over 3,000 individual petitions for extension; all of these petitions will raise virtually identical issues.¹⁷ Such a result is patently absurd, does not serve the public interest, and does not fairly and reasonably accommodate the interests of justice. By contrast, interpreting Section 107(c) to permit blanket extensions would avoid such an anomalous result.

C. The Commission should grant a blanket extension.

In light of the above, the Commission has authority under Sections 4(i) and (j) of the Communications Act as well as CALEA Section 107(c) to grant the requested blanket extension. It should do so promptly. Nevertheless, if the Commission accepts DOJ/FBI's argument that it lacks authority to grant a blanket extension, AirTouch urges the Commission to establish procedures to minimize the burden of addressing extension requests on a carrier-by-carrier basis. To that end, AirTouch recommends that the Commission utilize its action on the pending individual extension petitions to establish procedures which would permit carriers which utilize equipment previously the subject of an extension order to obtain an extension on an expedited basis, based upon an abbreviated evidentiary showing.

II. Length of the Extension Period.

As recently as April 14, 1998, the DOJ/FBI, consistent with the Attorney General's congressional testimony in February, took the position that "the compliance date should be extended for a period of 18 months after the Commission's order is issued in this proceeding."¹⁸ However, DOJ/FBI reversed course in their May 15, 1998 reply comments. They now assert that an extension should terminate on the earlier of (a) December 1999, two years after the industry standard they now challenge becomes effective, or (b) "if and when a compliance solution that *substantially* facilitates compliance on an industry-wide basis becomes available."¹⁹ In essence, DOJ/FBI take the position that the first vendor to develop a

¹⁷ The FBI estimated prior to the award of C, D, E, and F block PCS licenses that 3,000 carriers were subject to CALEA. See "FBI Implementation of Section 109 of CALEA," 61 Fed. Reg. 21396, 21398 (May 10, 1996).

¹⁸ April 14 DOJ/FBI Ex Parte at 2. The Communications Act authorizes the Commission to enter an extension up to "two years after the date on which the extension is granted." 47 U.S.C. § 1006(c)(3)(B). Equipment vendors and carriers have urged the Commission to enter a two-year extension.

¹⁹ DOJ/FBI Reply at 12 ¶ 19 and 13 ¶ 21 (emphasis added).

“substantially” complete CALEA solution — whatever that means — should be rewarded by receiving a *de facto* monopoly without regard to carrier requirements and system configuration.²⁰

In taking this position, the DOJ/FBI are relying on a “network solution” being developed by Bell Emergis, a foreign manufacturer, as opposed to the “switch solutions” being developed by carrier vendors.²¹ While AirTouch welcomes the opportunity of having choices in CALEA solution suppliers, DOJ/FBI have neglected to advise the Commission that a major carrier following the conduct of a feasibility study has concluded that the proposed Bell Emergis product solution contains:

significant technical problems that would require substantial modification before it could operate with the existing network and be compliant with CALEA.²²

Moreover, Bell Emergis, *which also supports a compliance extension*, admits that its product is at best incomplete, noting that “certain CALEA functionality can *only* be provided through a switched-based alternative.”²³ Thus, on its own terms, the DOJ/FBI position is flawed.

More fundamentally, however, the DOJ/FBI position conflicts directly with the statutory language and express intent of CALEA. Congress made clear in CALEA that the government is prohibited from “requir[ing] any specific design of equipment, facilities, services, features, or system configurations to be adopted by any” carrier.²⁴ CALEA’s legislative history also clarifies that “the telecommunications industry itself shall decide how to implement law enforcement’s requirements.”²⁵ Thus, neither law enforcement, nor the Commission on its

²⁰ As a practical matter, a carrier purchasing the “first” solution will not purchase another solution even if the latter is superior or less costly.

²¹ See DOJ/FBI Reply at 13 ¶ 21.

²² Ameritech Comments, CC Docket No. 97-213, at 7 (May 8, 1998).

²³ Bell Emergis Comments, CC Docket No. 97-213, at 3 (May 8, 1998)(emphasis added). See also *id.* at 4 (its product “provides a novel approach to resolving *some* of the issues surrounding compliance of CALEA.”)(emphasis added).

²⁴ 47 U.S.C. § 1002(b)(1)(A).

²⁵ House Report at 19; see also *id.* at 23 (“[L]aw enforcement agencies are not permitted to require the specific design of systems or features The legislation leaves it to each carrier to decide how to comply.”); *id.* at 26 (“Section [106(a)] requires a telecommunications carrier to consult with its own equipment manufacturers and support

behalf, may order carriers to adopt the admittedly incomplete Bell Emergis solution — or that of any other vendor — as DOJ/FBI contend in their reply comments.

Congress gave carriers the flexibility to choose their respective CALEA solution for good reason. Most CALEA modifications will be funded by carriers, and these new costs inevitably will be passed through to consumers.²⁶ A network solution such as that provided by Bell Emergis may provide an attractive solution (assuming Bell Emergis can correct the current defects with its product). However, there is also a separate risk presented in using a network solution — even if one were to assume that a network solution would be available more quickly than a switch solution. While a network solution developed by one vendor may work today, it may not work when other vendors modify their switches to support new technologies and services.²⁷ Such a result could be catastrophic and would completely undermine law enforcement objectives.

III. Conclusion

AirTouch shares DOJ/FBI's belief that CALEA's assistance capability requirements should be implemented as soon as possible; there is no intent here to evade CALEA requirements. Nevertheless, it is beyond dispute that telecommunications carriers need and are entitled to an extension of the CALEA compliance deadline under CALEA Section 107(c). Further, the Commission has ample legal authority to grant a blanket extension of the deadline for the full two years authorized by the statute. Finally, an extension will neither negatively

service providers to ensure that equipment or services comply with the capability requirements.”); *id.* at 27 (“Compliance with the industry standards is voluntary, not compulsory. Carriers can adopt other solutions for complying with the capability requirements.”).

²⁶ Under CALEA, carriers may obtain government reimbursement for capability modifications only in two circumstances: for equipment installed before 1995 and for equipment installed after 1994 when the Commission determines that compliance is not reasonably achievable. *See* 47 U.S.C. § 1008(a), (b)(2), and (d).

²⁷ It is perhaps not surprising, therefore, that Congress expected that each carrier would likely find solutions from “*its own* equipment manufacturer.” House Report at 26 (emphasis added). *See also* 47 U.S.C. § 1005(a) (“A telecommunications carrier shall consult . . . with manufacturers of *its* telecommunications transmission and switching equipment”)(emphasis added).

effect law enforcement's continued ability to conduct "basic" interceptions during the interim,²⁸ nor negatively affect its ability to conduct "enhanced" interceptions.²⁹

For all the foregoing reasons, AirTouch urges the Commission to act expeditiously and efficiently by granting a blanket extension of the CALEA compliance deadline for two years after the existing deadline. Alternatively, the Commission should extend the compliance deadline until it both rules on the petitions challenging the industry J-STD-025 standard, and concludes a proceeding to determine the appropriate compliance deadline in light of the standards adopted.

Sincerely,

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cc: Attached Service List

²⁸ AirTouch finds noteworthy that last year law enforcement conducted a record number of Title III interceptions. *See* Report of the Director of the Administrative Office of the U.S. Courts, "Applications for Orders Authorizing or Approving the Interception of Wire, Oral, or Electronic Communications" (April 1998).

²⁹ Law enforcement cannot conduct CALEA-based interceptions until carriers have access to CALEA solutions *and law enforcement has access to collective devices capable of receiving carrier CALEA solutions*. Neither product will be available commercially until the Commission resolves the question of what capabilities CALEA requires and does not require.

Certificate of Service

I, Brian G. McGuckin, hereby certify that a copy of the foregoing Ex Parte of AirTouch Communications, Inc. was sent by hand or United States first-class mail, postage prepaid, on this the 19th day of June, 1998 to the parties listed below.



Brian G. McGuckin

June 19, 1998

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